

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
KATHRYN C. NEWMAN  
3 Assistant Federal Public Defender  
Nevada State Bar No. 13733  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Kathryn\_Newman@fd.org

7 Attorney for Samuel Lane Donesing

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 SAMUEL LANE DONESING, and  
14 JAEMILLA EAGENS,

15 Defendants.

Case No. 2:18-cr-246-RFB-NJK

**UNOPPOSED MOTION FOR  
PREPARATION OF PRE-PLEA  
PRESENTENCE REPORT (PSR)**

16 Defendant Samuel Donesing requests the Court enter an order directing the United  
17 States Department of Probation to prepare a Pre-Plea Presentence Investigation Report (PSR)  
18 to determine the defendant's Criminal History.

19 On DATE, Mr. Donesing was charged in a X count indictment with X and Y. The  
20 parties are attempting to negotiate this case. The parties believe that they may be able to resolve  
21 this case short of trial. Based on defense counsel's review of Mr. Donesing's criminal record,  
22 there appear to be a number of issues with respect to how his prior convictions will be counted.  
23 To satisfy Mr. Donesing's concerns and to assure that he has the information he needs to make  
24 a truly knowing and intelligent decision, as to whether to accept or reject a plea offer, he has  
25 requested that a Pre-Plea Presentence Investigation Report be completed so that he understands  
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1 how Probation will calculate his Criminal History Points and corresponding category. Defense  
2 counsel has spoken with AUSA Linda Mott and she does not oppose this motion.

3 Conclusion

4 Mr. Donesing respectfully requests the Court order the United States Department of  
5 Probation to prepare a Pre-Plea Presentence Investigation Report to determine his Criminal  
6 History Points and corresponding Criminal History Category.

7  
8 DATED this 6th day of May, 2019.

9 RENE L. VALLADARES  
Federal Public Defender

10 By: /s/ Kathryn C. Newman

11 KATHRYN C. NEWMAN  
12 Assistant Federal Public Defender  
13 Attorney for Samuel Lane Donesing

14  
15 **[PROPOSED] ORDER**

16 IT IS HEREBY ORDERED, based on the foregoing motion, and good cause  
17 appearing, that the United States Department of Probation for the District of Nevada shall  
18 prepare a Pre-Plea Presentence Investigation Report (PSR) with respect to Defendant Samuel  
19 Lane Donesing's Criminal History Points and Criminal History Category.

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22 RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

23 DATED: May 7, 2019.

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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on May 6, 2019, she served an electronic copy of the above and foregoing Unopposed Motion for Preparation of a Pre-Plea PSR by electronic service (ECF) to the person named below:

NICHOLAS. TRUTANICH  
United States Attorney  
LINDA MOTT  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ April Graham  
Employee of the Federal Public Defender